



**Re: FW: June 2 meeting**   
**Dave Bartus** to: Conaway, Kathy (ECY)

05/26/2010 12:45 PM

You could also mention that the hydrogeologist's objections were first noted 4/9, almost seven weeks ago, apparently with nothing of substance provided to anyone subsequent to that date. If it takes nearly two months to even discover what the issue is that needs to be resolved, how long will it take to actually resolve the issue, and does Ecology have a snowballs chance you-know-where to have this section of the re-issue permit in place by October?

"Conaway, Kathy (ECY)"

Deb, where is our GW support's perspecti...

05/26/2010 12:39:17 PM

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From: "Conaway, Kathy (ECY)" <KCON461@ECY.WA.GOV>  
To: "Singleton, Deborah (ECY)" <dsin461@ECY.WA.GOV>, "Skinnarland, Ron (ECY)" <RSKI461@ECY.WA.GOV>  
Date: 05/26/2010 12:39 PM  
Subject: FW: June 2 meeting

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Deb, where is our GW support's perspective with regulatory and technical justification for what GW Monitoring for trench 31, 34, and 94 should look like? I have not seen anything and nothing verbally. Will you please, please ask (insist) that this be provided for the meeting and prior to the meeting would be better.

-----Original Message-----

From: Bartus.Dave@epamail.epa.gov [mailto:Bartus.Dave@epamail.epa.gov]  
Sent: Wednesday, May 26, 2010 9:25 AM  
To: Conaway, Kathy (ECY); Goswami, Dib (ECY); Skinnarland, Ron (ECY); Whalen, Cheryl (ECY); Bartus.Dave@epamail.epa.gov; Ayres, Jeff (ECY)  
Cc: Albright.Rick@epamail.epa.gov  
Subject: June 2 meeting

I guess I'm a bit confused about the request "prepared to present your perspective (with regulatory or technical justification) of what groundwater monitoring for the operating units (trench 31, 34 and 94) should look like." This work has already been done multiple times - if it is necessary to do so again, I'll be happy to. That said, I think its important to point out that both EPA and Ecology have long since documented perspectives with regulatory and technical justification on this issue.

First, I'd point out the Hanford Ground Water Strategy, DOE/RL-2002-59, which was signed by both EPA and Ecology. At the time this document was developed, Dib was the lead technical representative of Ecology, so I presume that its contents reflect the official view of Ecology with respect to Trenches 31 and 34. See in particular, Sections 4.1 and C.1.

(See attached file: RL-2002-59.pdf)

I'd also point out the regulatory analysis I prepared in August of 2008. I've provided this document on several occasions to Ecology, so it should not be new information. This document presents a very thorough analysis of the technical and regulatory arguments, so I'd present this as the requested documentation of EPA's perspectives and regulatory and policy justification of groundwater monitoring for Trenches 31, 34 and 94.

(See attached file: Regulatory Analysis - groundwater monitoring.doc)

Finally, EPA perspectives are reflected in the meeting notes from 4/6/2010. The groundwater aspects of this document are fully consistent with the two other documents noted above. These notes were, as I understand events, the basis for Deb's e-mail of 4/9/2010 identifying unspecified groundwater issues that must be resolved before proceeding further.

(See attached file: Meeting Notes 04062010.doc)

[attachment "RL-2002-59.pdf" deleted by Dave Bartus/R10/USEPA/US] [attachment "Regulatory Analysis - groundwater monitoring.doc" deleted by Dave Bartus/R10/USEPA/US] [attachment "Meeting Notes 04062010.doc" deleted by Dave Bartus/R10/USEPA/US]